



United States District Court  
Eastern District of Virginia  
Norfolk Division or Newport News Division (choose one)

Plaintiff's Name Shirley Jusbo  
Address 137 Happy Street Va Beach VA 23452  
Telephone Number 757 679 2845

v.

Case Number: Given by Clerk

Defendant's Name Steve C. Taylor  
Address 133 Mt. Pleasant Road Chesapeake VA  
Telephone Number 757 482-5705 23322

COMPLAINT

1. Grounds for jurisdiction. (Why do you think Federal Court is the appropriate court for your case?) See Attached

2. Facts of the case. Be specific. What events occurred? When did the events occur? Who was involved? Why do you contend the acts were wrongful? (You may use as much space as necessary.) The last paragraph should state the relief you are seeking. See Attached

3. If applicable, describe how and when you exhausted any administrative remedies.  
Upon receipt of notification from EEOC - dated January 12, 2015.

SIGNATURE Shirley Jusbo  
Name (Printed) Shirley Jusbo  
Address 137 Happy St  
Telephone Number VA Beach VA  
23452  
757 679 2845

① I halted the administrative process. July 31, 2014, the U.S. EEOC - Norfolk Office issued a finding of discrimination stating that charging party was laid off in retaliation for filing a charge of discrimination. Sept 20, 2014, the U.S. EEOC - Norfolk Office sent charging party an email stating that the process through Conciliation was unsuccessful because respondent (Steve Taylor) refused to settle. On January 16, 2015, charging party received a 'Notice of Right to Sue' (Conciliation Failure) document from U.S. EEOC - Norfolk Office. EEOC found reasonable cause to believe that violations of the statute(s) occurred with respect to some or all of the matters alleged in the charge, but could not obtain a settlement with the respondent that would provide relief to charging party. (Document Attached)

② Charging Party filed charge of discrimination with EEOC on May 28, 2010. Since Filing, Charging Party (Shirley) (1860) has been subjected to harassment by Superior up to March 24, 2011. For example, Charging Party was denied annual raise, was given written memos regarding work performance (none prior to filing), calls being monitored, required to cover the phone for lunch if not attending Bible Study, being compelled to contribute, receiving emails ending "Much love" And work hours reduced to 35 hours per week. Did not have any of these issues prior to filing charge.

I am seeking \$175,000 (compensatory damages), \$77,616 in loss wages - April 2011 - Present. and \$175,000 in punitive damages

**(M) Ghostwriting:**

- (1) Any attorney who prepares any document that is to be filed in this Court by a person who is known by the attorney, or who is reasonably expected by the attorney, to be proceeding *pro se*, shall be considered to have entered an appearance in the proceeding in which such document is filed and shall be subject to all rules that govern attorneys who have formally appeared in the proceeding.
- (2) All litigants who are proceeding *pro se* shall certify in writing and under penalty of perjury that a document(s) filed with the Court has not been prepared by, or with the aid of, an attorney or shall identify any attorney who has prepared, or assisted in preparing, the document.

**Each document filed with the court by a *pro se* litigant shall bear the following certification:**

**CERTIFICATION**

I declare under penalty of perjury that:

- (1) No attorney has prepared, or assisted in the preparation of this document.

Shirley J. Ugbo

Name of *Pro Se* Party (Print or Type)

Shirley J. Ugbo

Signature of *Pro Se* Party

Executed on: 4-10-15 (Date)

OR

**CERTIFICATION**

2) \_\_\_\_\_

(Name of Attorney)

\_\_\_\_\_  
(Address of Attorney)

\_\_\_\_\_  
(Telephone Number of Attorney)

Prepared, or assisted in the preparation of, this document.

\_\_\_\_\_  
(Name of *Pro Se* Party (Print or Type)

\_\_\_\_\_  
Signature of *Pro Se* Party

Executed on: \_\_\_\_\_ (Date)